

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Greenbelt Division**

COREY POLLARD,

Plaintiff,

v.

TRANS UNION, LLC,

Defendant.

Case No.

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC, (“TransUnion”) by and through its undersigned counsel, hereby removes this action filed by Plaintiff Corey Pollard (“Plaintiff”) from the Circuit Court for Howard County, Maryland to the United States District Court for the District of Maryland. In support of this Notice of Removal, TransUnion states the following:

1. On April 12, 2024, Plaintiff served TransUnion with a Summons and Complaint filed in the Circuit Court for Howard County, Maryland, as Case No. C-13-CV-24-000215. A copy of the Summons and Complaint are attached hereto as **Exhibit A**. No other process, pleadings, or orders have been served on TransUnion.

2. Attached hereto as **Exhibit B** is a copy of TransUnion’s Notice of Filing Notice of Removal to be filed in the Circuit Court for Howard County, Maryland, Case No. C-13-CV-24-000215.

3. Plaintiff’s Complaint implies claims under the Fair Credit Reporting Act (“FCRA”), and alleges that Trans Union invaded Plaintiff’s privacy by collecting his personal information. *See* Exhibit A, § 18 Complaint.

4. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question implied by Counts I and II of the Complaint. As alleged, this suit falls within the purview of the FCRA, which thus supplies this federal question.

5. Even if Plaintiff's claims do not imply claims under the FCRA, the FCRA operates to preempt Plaintiff's claims such that this Court has jurisdiction.

6. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Circuit Court for Howard County, Maryland to the United States District Court for the District of Maryland.

7. Removal is timely under 28 U.S.C. § 1446 because this Notice of Removal is filed within 30 days after TransUnion's receipt of a copy of the Complaint filed in the Circuit Court for Howard County, Maryland.

8. Copies of this Notice of Removal shall forthwith be served upon Plaintiff and the Clerk of Court for the Circuit Court for Howard County, Maryland.

WHEREFORE, TransUnion removes this civil action from the Circuit Court for Howard County, Maryland to the United States District Court for the District of Maryland.

Dated: May 10, 2024

Respectfully submitted,

TRANS UNION, LLC

By Counsel

/s/ Jacob M. Adams

Jacob M. Adams (Md. Fed. Bar No. 31004)

Geoffrey G. Grivner (Md. Fed. Bar No. 20174)

BUCHANAN INGERSOLL & ROONEY PC

1737 King Street, Suite 500

Alexandria, VA 22314-2727

Tel.: (703) 838-6516

Email: jake.adams@bipc.com

Counsel for Defendant Trans Union, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of May, 2024, I caused a true and correct copy of the foregoing document to be served electronically via the Court's CM/ECF system. I further certify that a true and correct copy of the foregoing document was served on the following parties via First Class, U.S. Mail, postage prepaid and properly addressed as follows:

Corey Pollard
P.O. Box 6771
Columbia, MD 21045

Pro Se Plaintiff

/s/ Jacob M. Adams
Jacob M. Adams, Esq.

Counsel for Defendant Trans Union, LLC